

EXHIBIT D

**DECLARATION OF DONAVAN AUBIN**

Pursuant to 28 U.S.C. §1746, I, Donovan Aubin, declare as follows:

1. I am above the age of eighteen and reside at 39 High Street, Berlin, New Hampshire 03570.
2. I was incarcerated in the Coös County House of Corrections in West Stewartstown, New Hampshire, on October 2-3, 2022.
3. On October 2-3, 2022, I was being held in Cell Block 307, Cell B.
4. On October 2, 2022, Joseph Courchesne (“Joey”) was brought into Cell Block 307 and put into Cell A, which was next to my cell.
5. I have personally known Joey for about 16 years and was able to recognize him by both appearance and voice.
6. I witnessed Joey interact with Coös County House of Corrections staff from the time he was brought to Cell Block 307 until he died on October 3, 2022.
7. Based on my interactions with Joey, it was clear he was hallucinating and going through alcohol withdrawal.
8. While Correctional Officers (“CO”) Kelsea and Dagesse were bringing him to Cell Block 307, I heard Joey tell them that he did not belong there and that he belonged in a hospital because something was not right.
9. CO Kelsea and Dagesse told him that he was not going to the hospital and, instead of getting him medical attention, they stripped his clothes off and put him into a turtle suit used to prevent inmates from hurting themselves.

10. Joey kept asking them for his clothes back. He told them that he was not going to hurt himself, and that he needed to go to the hospital. CO Kelsea and Dagesse denied his request to go to the hospital and left him in his cell.

11. I tried to talk let Joey know that I was there, but he kept forgetting that I was there and when I would try to talk to him, he would respond as if he was in fear, asking who was there in a tone of voice that was fearful and unusual for him.

12. Later, CO Dagesse and Kelsea returned to his cell with a male nurse, who tried to give Joey medication through his cell door. Joey told them that he needed medical attention and had to go to the hospital because something was severely wrong.

13. When Joey did not take the medication, the male nurse told him that if he was not going to take his medication, then they would not give it to him and that he would not be going to the hospital for medical attention.

14. CO Dagesse, Kelsea and Purrington came back to Cell Block 307 a short time later and entered Joey's cell to get a book he had. Joey again asked them for medical attention and told them that he needed to go to the hospital. They again denied his request.

15. After that, when laundry exchange was being done, I heard Joey ask for medical attention, and he heard him yelling out from his cell that he needed to see a doctor and that they could handcuff him and bring him to the hospital.

16. Then, at lights out, CO Benoit entered Cell Block 307. Joey begged him for medical attention and to not to shut off the lights because someone he believed to see in his cell was going to kill him. CO Benoit laughed at Joey then shut off the lights.

17. I did not hear Joey speak another word after the lights were shut off. No one came to check on Joey after he suddenly stopped speaking and begging for medical help until about an hour or two later when CO Benoit returned and found Joey unresponsive.

18. From the time Joey was put in his cell until he stopped speaking when the lights were shut off, I observed his hallucinations and withdrawal symptoms continuously worsen and heard him continually yell for medical attention.

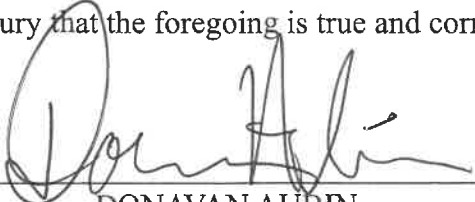
19. When he first got to his cell, he said he was playing the “burrito game,” but we do not have access to games in Cell Block 307. He also asked me to come “smoke this joint” with him, which made me believe he was hallucinating.

20. These hallucinations worsened throughout the day and Joey eventually told me that he was speaking to and could see the devil, then he became very fearful that someone in his cell was going to kill him.

21. Although he was hallucinating, Joey kept asking for medical attention and yelling that he needed to go to the hospital because something was severely wrong until the lights were shut off. He even offered to be handcuffed if they would take him to the hospital.

22. Joey begged for medical attention and to go to the hospital every time a CO entered Cell Block 307, including CO Benoit, Dagesse, Kelsea and Purrington, which was about every 30-60 minutes from the time he was put in his cell until lights out later that night.

23. I declare under penalty of perjury that the foregoing is true and correct.  
Executed on October 3, 2024.



DONAVAN AUBIN